

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

NORTH AMERICAN SPECIALTY
INSURANCE COMPANY

Plaintiff

VS.

MARY & JOSEPHINE CORP. and
MATTEO RUSSO

Defendants

CIVIL ACTION NO: 04-10374WGY

**THE PARTIES' JOINT RULE 26(f) REPORT OF
DISCOVERY PLANNING CONFERENCE**

Now come the parties to the above captioned matter and herewith file a report of their Fed. R. Civ. P. Rule 26(f) Discovery Planning Conference.

The conference took place on April 5-7, 2004, and all parties were represented at the conference by their respective counsel of record. After good faith discussions concerning the nature of the case and the scope of expected discovery, the parties offer the following proposed discovery plan:

- 1) All Rule 26(a)(1) disclosures shall be served on or before May 15, 2004;
- 2) All interrogatories and Rule 34 requests for production of documents shall be served on or before June 15, 2004;
- 3) All fact depositions shall be concluded on or before November 15, 2004;
- 4) Expert disclosure shall be completed on or before December 15, 2004;

- 5) All expert depositions shall be completed on or before February 1, 2005; and
- 6) All dispositive motions shall be filed on or before February 15, 2005.

The Parties,
By their attorneys

NORTH AMERICAN SPECIALTY INSURANCE
COMPANY, plaintiff

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MARY & JOSEPHINE CORP., defendant

“/s/”

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MATTEO RUSSO, defendant

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Dated : April 26, 2004